

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION (DETROIT)

In re:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9

Case No. 13-53846-swr

Hon. Stephen W. Rhodes

**VERIFIED STATEMENT OF LIPPITT O'KEEFE PLLC
AND SILVERMAN & MORRIS, P.L.L.C. PURSUANT TO F.R.B.P. 2019**

Lippitt O'Keefe PLLC and Silverman & Morris, P.L.L.C. ("Law Firms"), declare pursuant to Federal Rule of Bankruptcy Procedure 2019 as follows:

1. The Law Firms represent the following creditors or parties in interest (together, the "Retiree Association Parties"):
 - A. Detroit Retired City Employees Association ("DRCEA").
 - B. Retired Detroit Police and Fire Fighters Association ("RDPFFA").
 - C. Shirley V. Lightsey, individually and as president of the DRCEA.
 - D. Donald Taylor, individually and as president of the RDPFFA.
2. The Retiree Association Parties are working in concert for the protection of the rights of members of the DRCEA and RDPFFA and other retired employees of the City of Detroit, and the survivors of such retired employees. The membership and boards of the DRCEA and RDPFFA may each constitute a group or committee as those term are used in F.R.B.P. 2019. The DRCEA was formed in 1960. The predecessor of

the RDPFFA was formed in 1946. The Retiree Association Parties have not entered into a formal agreement regarding the positions which each may take in this case. The DRCEA and RDPFFA remain under the governance of their respective boards of directors. The United States Trustee has separately appointed an official retiree committee. Ms. Lightsey and Mr. Taylor each serve on that retiree committee.

3. The address of the DRCEA is:

Detroit Retired City Employees Association
P.O. Box 14520
Detroit, Michigan 48214

4. The address of the RDPFFA is:

Retired Detroit Police & Fire Fighters Association
2525 E. 14 Mile Road
Sterling Heights, Michigan 48310-5969

5. Members of the DRCEA and of the RDPFFA, including Ms. Lightsey and Mr. Taylor, hold economic interests in relation to the case by virtue of being retirees entitled to pension payments and other post-employment benefits such as medical insurance. These economic interests have not been quantified. The DRCEA and RDPFFA each have thousands of members. It has not been determined whether the interests of those members are “disclosable economic interests” as that term is defined in F.R.B.P. 2019(a).

6. Further information is available from the undersigned.

7. I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

SILVERMAN & MORRIS, P.L.L.C.

By: /s/ Thomas R. Morris

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